

KENNETH B. WILSON, State Bar No. 130009
kwilson@perkinscoie.com
SCOTT EADS, Oregon State Bar No. 91040, admitted *pro hac vice*
seads@perkinscoie.com
ELIZABETH SCHWARTZ, Oregon State Bar No. 96112, admitted *pro hac vice*
eschwartz@perkinscoie.com
STEFANI E. SHANBERG, State Bar No. 206717
sshanberg@perkinscoie.com
DIETER H. HELLMOLDT, State Bar No. 221498
dhellmoldt@perkinscoie.com
PERKINS COIE LLP
180 Townsend Street, Third Floor
San Francisco, California 94107-1909
Telephone: (415) 344-7000
Facsimile: (415) 344-7050

Attorneys for Defendants and Counterclaimants
BJ Crystal, Inc., Crystal Magic, Inc., Jimac
Marketing, Inc., Cerion GmbH, Crystal
Capture, Inc., Vitro Laser Group USA, Inc.,
Vitro Laser GmbH, and Meritage Graphics, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LASER DESIGN INTERNATIONAL, LLC; and
NORWOOD OPERATING COMPANY,
Plaintiffs,

v.

BJ CRYSTAL, INC., et al.,
Defendants.

AND RELATED COUNTERCLAIMS

Lead Case No. C 03-01179 JSW
Consolidated with No. C 03-03905 JSW
**STIPULATION AND [PROPOSED]
ORDER RE MODIFICATION OF
DEADLINES FOR LEDGER AND
SUNMAN DEPOSITIONS**

Honorable Jeffrey S. White

Plaintiffs Laser Design International, LLC and Norwood Operating Company (“Plaintiffs”) and Defendants BJ Crystal, Inc., Crystal Magic, Inc., Jimac Marketing, Inc., Cerion GmbH, Crystal Capture, Inc., Vitro Laser Group USA, Inc., Vitro Laser GmbH, and Meritage Graphics, Inc. (“Defendants”) by their undersigned counsel hereby stipulate as follows:

1. On April 18, 2006, the Court ordered that Defendants may take the depositions of Dr. Neville Richard Ledger and Mr. Robert Peter Sunman, both inventors of the patent at issue,

STIPULATION AND [PROPOSED] ORDER RE MODIFICATION OF
DEADLINES FOR LEDGER AND SUNMAN DEPOSITIONS
LEAD CASE NO. C 03-01179 JSW
CONSOLIDATED WITH NO. C 03-03905 JSW
PA061450.052

1 after the March 31, 2006 discovery cutoff. The Court further ordered that Defendants shall
2 conduct those depositions by no later than May 26, 2006.

3 2. On May 17, 2006, the Court ordered that Defendants may amend their final
4 invalidity contentions and that the discovery deadline is extended until August 18, 2006 for
5 conducting discovery with respect to the newly-asserted items of prior art.

6 3. As of the date of this filing, the Senior Master of the Queen's Bench Division of the
7 Supreme Court of England and Wales has not yet ruled on Defendants' request to take those
8 depositions, which was submitted as a Letter of Request for International Judicial Assistance
9 pursuant to the Hague Convention of March 18, 1970 on the Taking of Evidence Abroad in Civil
10 or Commercial Matters.

11 4. In view of the extended discovery schedule and the fact that the Senior Master of
12 the Queen's Bench Division has yet to issue an order on Defendants' Letter of Request, the
13 undersigned hereby stipulate that Defendants may have until August 18, 2006 to complete the
14 depositions of Dr. Neville Richard Ledger and Mr. Robert Peter Sunman.

15 Date: May 25, 2006.

PERKINS COIE LLP

17 By: /s/
18 Elizabeth Schwartz, OSB No. 96112
19 Admitted *Pro Hac Vice*
Attorneys for Defendants and
Counterclaimants

20 Date: May 25, 2006.

COOLEY GODWARD LLP

22 By: /s/
23 Brian E. Mitchell, State Bar No. 190095
24 Attorneys for Plaintiffs
Laser Design International, LLC
and Norwood Operating Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 30, 2006

By: 

HONORABLE JEFFREY S. WHITE
United States District Judge